

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

---

JAMAAL LLOYD, individually and on behalf  
of all others similarly situated, and on behalf  
of the W BBQ Holdings, Inc. Employee Stock  
Ownership Plan,

Plaintiff,

Case No. 1:22-cv-04129-VSB

v.

ARGENT TRUST COMPANY, HERBERT  
WETANSON, GREGOR WETANSON, and  
STUART WETANSON,

Defendants.

---

**DECLARATION OF GREGOR WETANSON**

I, Gregor Wetanson, hereby declare under penalty of perjury as follows:

1. I am employed by W BBQ Holdings, Inc. ("WBBQ") as Chief Executive Officer. I am over twenty-one years of age and am authorized to make this Declaration on behalf of WBBQ and myself.
2. This Declaration is based on my personal knowledge and upon WBBQ's business records available to me in my role as Chief Executive Officer.
3. The document attached as Exhibit A to this Declaration is a copy of the W BBQ Holdings, Inc. Employee Stock Ownership Plan, effective January 1, 2016.

4. The document attached as Exhibit B to this Declaration is a copy of an Amendment to W BBQ Holdings, Inc. Employee Stock Ownership Plan, effective January 1, 2019.

5. The document attached as Exhibit C of this Declaration is a copy of an Action by Unanimous Written Consent of the Board of Directors of W BBQ Holdings, Inc., dated April 24, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7-28-22

  
\_\_\_\_\_  
Gregor Wetanson